



Solid Waste Regulatory Compliance
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Date: June 07, 2005
Refer To: ENV-SWRC:05-036

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Lee Winn
Environmental Specialist
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



SUBJECT: NMED COMMENTS ON THE SITE TREATMENT PLAN (STP) FISCAL YEAR 2004 UPDATE AND REVISION 15.0 PROPOSAL, LOS ALAMOS NATIONAL LABORATORY (LANL) FEDERAL FACILITY COMPLIANCE ORDER (FFCO), ORDER 4, 1995

Dear Ms. Winn:

On April 11, 2005, we met to discuss your review of the Los Alamos National Laboratory (LANL) Site Treatment Plan Fiscal Year 2004 Update and Revision 15.0 Proposal, dated March 18, 2005. As a result of your review, you requested information on the following:

- 1.) In a letter dated October 9, 2003, LANL notified the New Mexico Environment Department (NMED) of the return to LANL of approximately 1.5 cubic meters of mixed low level waste source segregated by WCS at its Andrew County, Texas facility. The letter stated that an increase in volume from the returned waste would be reflected in the next annual update (i.e. the FY2004 update). However, that waste shipment was not returned for storage at LANL but was transported from WCS on to Duratek in Tennessee for recycling within the DOE complex. Thus, there was no increase in volume as anticipated in the October 9, 2003 letter.
- 2.) In a letter dated October 29, 2003, LANL notified NMED that during characterization of items for off-site shipment, a gas cylinder, in treatability group LA-W918 for *Compressed Gases Requiring Oxidation* due to its EPA Code D001 for ignitability as a compressed gas, was found to not have a valve on the cylinder itself. The empty gas cylinder does not have an associated EPA code and is low-level waste. The letter stated the item volume (0.0425 m³) would be removed from inventory in the next annual revision. That decrease in volume was reflected in the FY2003 STP update.
- 3.) Table X.C.2.a.-1 of Revision 15 lists newly covered waste for FY2004. Most of the newly covered waste was shipped off site for treatment during FY2004. The small volume of newly covered waste that remained in storage at the end of FY2004 has been added to the appropriate sections of the compliance plan volume along with proposed compliance dates.
- 4.) You had several questions on discrepancies in volumes listed in expedited shipment letters and in tables in the annual update and revision. Corrections to the tables have been made.

Ms. Lee Winn
SWRC:05-036

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June 7, 2005

Enclosed is copy of the Site Treatment Plan (STP) Fiscal Year 2004 Update and Revision Proposal 15.0 that includes the changes discussed above in items 3 and 4.

Please contact me (505) 667-4715 or dyea@lanl.gov if you have any questions.

Sincerely,



Albert Dye
STP Project Manager

AD:vc

Enc. a/s

Cy: w/enc.
Mr. James Bearzi
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J. Nunz, DOE, LASO, A316
Author File, K490
SWRC File, K490
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